

100-1587  
1-56411762

Attorneys for Plaintiff  
McGregor Sea & Air Services (America) Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN DIEGO

McGREGOR SEA & AIR SERVICES  
(AMERICA) INC., A Delaware  
Corporation,

Plaintiff,

**УВ.**

CINEMATRONICS, INCORPORATED, A  
California Corporation,

Defendant.

)  
 ) CASE NO. 491479  
 )  
 ) DECLARATION OF C. BRADLEY HALLEN  
 ) IN SUPPORT OF APPLICATION FOR  
 ) RIGHT TO ATTACH ORDER

I, C. BRADLEY HALLEN declare as follows:

1. I am an attorney licensed to practice law in the State of California and employed by plaintiff MCGREGOR SEA & AIR SERVICES (AMERICA) INC. to process its claim for damages in the amount of \$87,829.01 against Cinematronics, Incorporated for breach of contract and related causes of action.

2. I have examined the official court file in San Diego Superior Court Case No. 490399. That file reveals that another creditor of defendant Cinematronics, Incorporated, Security Pacific National Bank, has filed a complaint against Cinematronics, Incorporated seeking \$3,174,035.59 plus interest.

1 On August 25, 1982, pursuant to noticed hearing, Security  
2 Pacific National Bank was granted a Right to Attach Order by  
3 the Honorable Edward T. Butler. An Order After Hearing was  
4 signed by Judge Butler on September 1, 1982.

5 3. As a result of the Right to Attach Order granted  
6 to Security Pacific National Bank, steps to ensure collectibility  
7 of any judgment obtained by McGregor Sea & Air Services (America)  
8 Inc. against Cinematronics are now urgently required.

9 4. It is essential that McGregor Sea & Air Services  
10 (America) Inc. be empowered to attach whatever assets of  
11 Cinematronics, Incorporated it may be able to locate at the  
12 earliest possible date subject to whatever previous levies are  
13 made by Security Pacific National Bank.

14 5. A notice hearing procedure would require a  
15 minimum of two-weeks notice even with an order shortening time.

16 6. At the expiration of a two-week period of time,  
17 it is my belief based on information available to me that there  
18 may well be insufficient assets of Cinematronics, Incorporated  
19 to attach.

20 7. I am informed that Cinematronics Incorporated is  
21 out of production and is attempting to sell its valuable  
22 electronics assembly inventory for spare parts at a fraction of  
23 the dollar worth of those items.

24 8. I am informed of the information in the preceding  
25 paragraph by one George Hartford, whose handwritten declaration  
26 is attached hereto as Exhibit "A" and incorporated herein by

27 . . . . .

28 . . . . .

1 reference. That declaration reveals that Cinematronics  
2 Incorporated appears to be out of production and is offering  
3 to sell parts at a substantial discount.

4 I declare under penalty of perjury that the foregoing  
5 is true and correct.

6 Executed this 2nd day of September, 1982, at  
7 San Diego, California.

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10 C. BRADLEY HALLEN  
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## Declaration of George Hartford

I, George Hartford declare as follows.

I own West Coast Pictures which is a distributing business. Approximately two weeks ago I discussed with Al Kaplan of Cinematronics Inc. the sale of a portion of its usual parts inventory. I made an offer of approximately twenty cents on the dollar of stock worth perhaps \$100,000.00. He refused the offer. I was at Cinematronics at the time of this discussion and I am definitely of the belief from my conversations at the establishment that production is no longer going on at Cinematronics. Also, a girl who appeared ~~was~~ to work in the capacity of a receptionist confirmed that production had ceased. At the time I obtained an inventory list from Cinematronics.

(p) ~~The reason~~ <sup>because</sup> Mr. Kaplan refused my offer ~~that~~ he wanted to try to sell to another buyer for more money. He definitely wanted to sell. My offer simply was not enough. Attached to this statement is a copy of the inventory list I obtained.

George Hartford

I declare under penalty of perjury that the foregoing is true and correct and, if sworn as an expert, I could testify competently.

Exhibit "A"

Exhibit "A"

Executed this 2nd day of SEPT, 1962

at San Diego, Calif.

George Hartford